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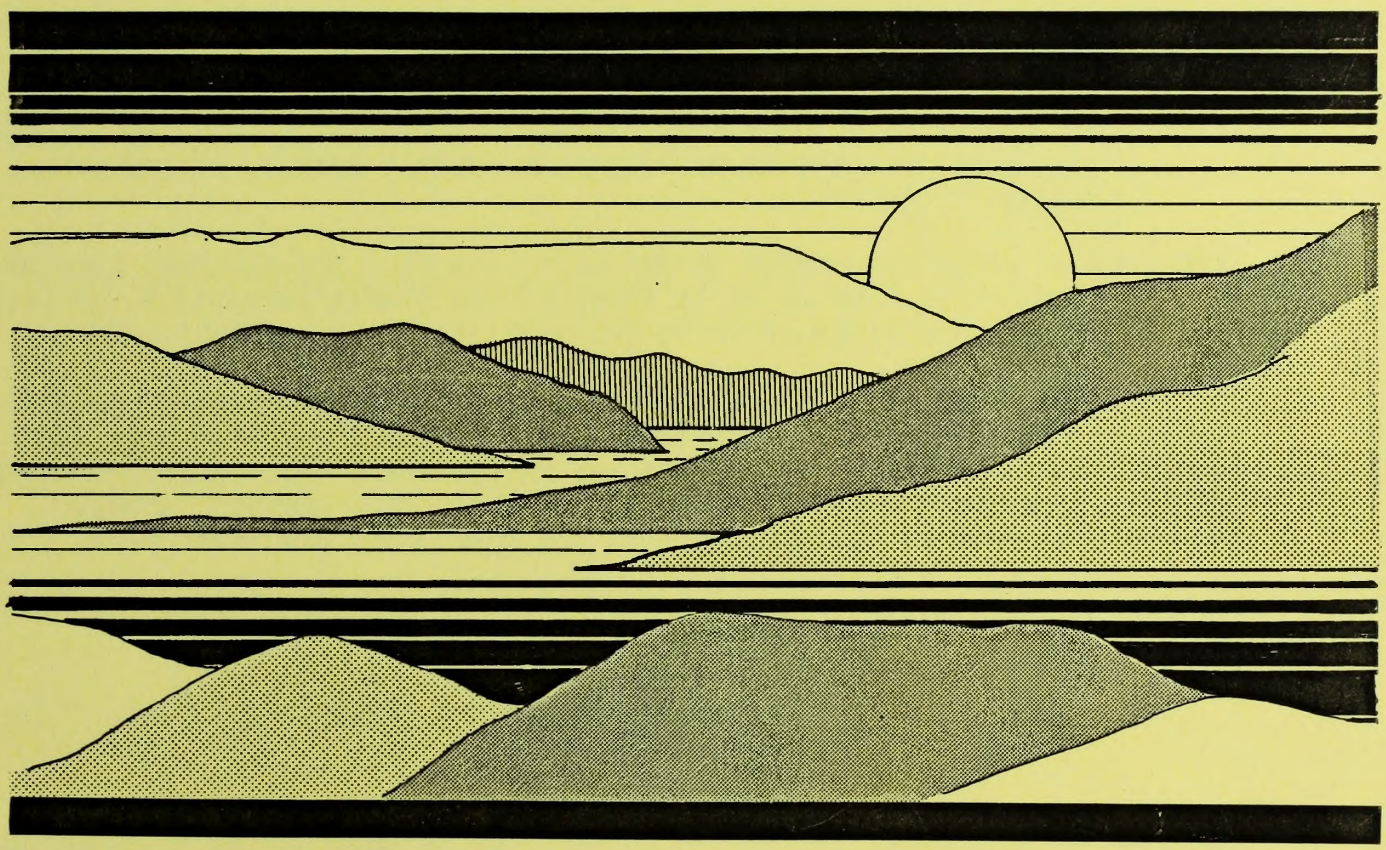
SOUTH SIERRA FOOTHILLS GRAZING MANAGEMENT

Final Environmental Impact Statement



August 1983

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Bakersfield District Office
800 Truxtun Avenue, Room 302
Bakersfield, California 93301

IN REPLY
REFER TO:

1792-NR14

Dear Reviewer:

The Bureau of Land Management proposes to implement a livestock grazing program on 246,000 acres of public land in the South Sierra Foothills Planning Area of south central California. The overall objective is to determine the proper management of livestock grazing on the public lands, based on the principles of multiple use, sustained yield, and maintenance of the environmental quality. Components of the proposed action include:

1. Managing annual grasslands by leaving certain amounts of residual mulch.
2. Adjustments of the stocking rates on perennial grasslands.
3. Introduction of livestock related developments including vegetation manipulation, spring developments, cattle guards, fences, and ungulate guzzlers.

Intensity of these components varies under the five alternatives considered. Mulch management is considered in three of the five alternatives. A brief description of each alternative is included in the introductory summary.

The draft Environmental Impact Statement for Grazing Management was made public on April 26, 1983. Because no major revision was required, the final EIS is limited to the comments received on the Draft EIS, responses to these comments, and minor revisions and corrections. This document should therefore be used in conjunction with the previously published Draft EIS.

For further information please contact:

Glenn A. Carpenter
Caliente Resource Area Manager
520 Butte Street
Bakersfield, CA 93305

Comments on this final EIS should be received by this office no later than in order to be considered in the subsequent decision.

Very truely yours,

Robert D. Rheiner, Jr.

Robert D. Rheiner, Jr.
District Manager

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DEPARTMENT OF THE INTERIOR

SOUTH SIERRA FOOTHILLS

FINAL

ENVIRONMENTAL IMPACT STATEMENT

Bureau of Land Management
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Prepared by

BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR

Ed Hastey

State Director, California State Office

SUMMARY

This EIS examines five alternatives:

1. Proposed Action (Present Management)
2. Livestock Maximization
3. Resource Protection
4. Balanced Resource Use
5. No Grazing

Dealing with four issues:

1. Impact of Grazing On Wildlife
2. Impact of Grazing On Water Quality and Watershed Protection
3. Economic Impacts of Grazing Management
4. Impact of Grazing On Recreation

Concerning Livestock Grazing:

1. On 198,113 acres
2. In the South Sierra Foothills Planning Area of the Caliente Resource Area, Bakersfield District.

General Land Use Goals are:

1. Maintain proper amounts of residual mulch on annual ranges and optimize yearly production on perennial ranges to:

   a. Insure maximum annual plant reproduction the following year.

   b. Insure that adequate feed is left so livestock are not unduly forced to browse brush plants that otherwise would be utilized as wildlife feed and cover.

   c. Protect the watershed from erosion and enhance water quality.

   d. Protect the aesthetic values of the grazed areas.

2. Increase forage production and availability for livestock and wildlife. Forage production will be increased by prescribed burns and rangeland management systems. Forage availability will be increased by additional water developments and fencing.

3. Further protect and enhance watershed and wildlife values by securing better distribution of livestock.

4. Protect cultural resource values and endangered plant and animal species and their respective habitats as required by law.

Alternative 1: Proposed Action - (Present Management)

The proposed action represents the present livestock grazing management for the study area. This alternative would allow for rangeland improvements as proposed by the livestock operator such as water developments and prescribed burns in chaparral.

Total grazing preference would remain at 14,299 AUM's. Tables 3-5* (Livestock Forage Allocations by Allotment) depict the total preference. In most cases active use is often much less than the total active preference, and this is especially so on larger operations. Ranchers that use less than their total active preference may simply activate more of this preference on favorable forage years. Ranchers that use all their preference and still have extra forage can apply for temporary non-renewable grazing privileges.

Ranchers could develop springs, conduct prescribed burns, and do other types of range improvements (See Table 6)*. An environmental assessment of all new rangeland improvements would be necessary for all alternatives.

No new Allotment Management Plans (AMP's) would be developed, and the two existing plans would not be modified except at the request of the rancher.

Nine allotments (136,804 acres) would be placed in the I Category; 14 allotments (28,793 acres) would go in the M Category, and 26 allotments (32,516 acres) would be put in the C Category. This alternative represents the traditional No Action Alternative.

Alternative 2: Livestock Maximization

The objective of this alternative is to achieve maximum livestock production within the constraints of sustained yield.

Forage would be allocated by residual mulch, not AUM's on the Mediterranean Annual I Category allotments in this alternative. This alternative would allot the maximum amount of the yearly annual production (standing crop) to livestock. It would leave a minimum amount of residual mulch. The amounts of mulch to be left on given slopes are presented in Table 3*.

Perennial areas in I Category allotments, as well as all areas in M and C Category allotments will be managed for AUM's. Again, a maximum amount of forage is allocated to livestock. Numbers of AUM's are presented in Tables 3-5*.

AMP's would be developed on all I Category allotments which do not already have one. The existing AMP's would be modified and improved to accommodate mulch management.

Many rangeland improvements, including a maximum amount of vegetation manipulation of both chaparral and pinyon pine, are proposed. These projects are presented in Table 7*.

The same allotments are proposed for the I, M, and C Categories as for Alternative 1.

Alternative 3: Resource Protection

This alternative would achieve optimum wildlife production while still allowing for limited livestock production. It would also favor other resource values.

Category I allotments on the Mediterranean Annual Type would again be managed for mulch. More mulch would be left on the ground after grazing than in Alternative 2. Fewer AUM's would be allocated to livestock on the other allotments. Tables 3-5* presents these mulch or AUM amounts.

The same I, M, and C Category allotments are projected for this alternative as for Alternative 1.

AMP's would be necessary on the I Category allotments to manage for mulch. Fewer rangeland improvements would be implemented than in Alternatives 1 and 2. These proposed improvements are listed in Table 8*.

Alternative 4: Balanced Resource Use

This alternative is intermediate between Alternative 2, Livestock Maximization and Alternative 3, Resource Protection. It allots as much forage as possible to livestock, after giving due consideration to wildlife, watershed, aesthetics, and other resources.

Again, areas in the I Category allotments in the Mediterranean Annual Type would be managed for mulch. Forage on the other allotments would be allocated by AUM's. Tables 3-5* present these mulch or AUM amounts.

The proposed allotments for the I, M, and C Categories are the same as for Alternatives 1, 2, and 3. AMP's on the I Category allotments would be necessary to manage for mulch.

Additional rangeland improvements, although not as many as in the Livestock Maximization Alternative, would be necessary. These are summarized in Table 9*.

Alternative 5: No Grazing

This alternative would eliminate all grazing on public lands in the study area. Livestock would be phased out over a five-year period. Thus, there would be no authorized livestock grazing by the end of 1988. No new rangeland improvements, except fences to exclude livestock, would be constructed; existing improvements would be removed if they did not have other multiple use values, such as water for wildlife.

Livestock grazing on public land would be considered trespass. Livestock trailing across public land for brief periods would be permitted.

Many miles of fencing would be necessary. This fencing would be the responsibility of adjacent land owners in closed range areas such as Tulare County, but it would be the responsibility of the BLM in open range areas such as most of Kern County.

*Please refer to the DEIS for these tables.

Table 1
Major Actions and Impacts of Alternatives

Major Actions	Proposed Action	Livestock Maximization	Resource Protection	Balanced Resource Use	No Grazing
Allotment Categories					
- Intensive (number)	9	9	9	9	-
- Maintenance (number)	26	26	26	26	-
- Custodial (number)	14	14	14	14	-
Range Improvements					
- Fences (miles)	1	14	1	14	2,000 (estimated)
- Springs (number)	25	40	1	26	0
- Guzzlers (number)	6	21	6	13	0
- Cattle Guards (number)	3	5	5	5	0
- Vegetation Manipulation (acres)	5610	9410	3140	6560	0
Impacted Resources					
- Wildlife	Deterioration of habitat expected on several allotments. Certain wildlife populations would decline.	Deterioration of habitat expected on several allotments. Certain wildlife populations would decline.	Wildlife populations will remain at present levels.	Wildlife populations would temporarily fall on Class I allotments and remain at present levels on Class M & C allotments.	Wildlife populations would increase as habitat grows back. In the long term, decadent chaparral communities would support lower diversity and abundance of wildlife.
-Water Resources	Decline in water quality and channel stability of streams and springs.	Decline in water quality and channel stability of streams and springs.	Minor improvements in water quality and channel stability of streams and springs.	Decline in water quality and channel stability of streams and springs.	Moderate improvement in water quality and channel stability of streams and springs.

Table 1 (Cont.)

Impacted Resources	Proposed Action	Livestock Maximization	Resource Protection	Balanced Resource Use	No Grazing
- Soils	Localized impacts from proposed rangeland improvements. Vegetation manipulation expected to increase upslope erosion and sedimentation for first 3 years after a prescribed burn.	Increased localized impacts due to the larger number of rangeland improvements proposed. Increased erosion and sedimentation from vegetation manipulation.	Fewer localized impacts due to the reduction in the number of rangeland improvements proposed. Minor increase in erosion & sedimentation from vegetation manipulation.	Minor localized impacts from the number of rangeland improvements proposed. Minor increase in erosion and sedimentation from vegetation manipulation.	Moderate improvements in soil conditions on all allotments with the elimination of livestock.
- Socio-Economics	Opportunity for some increase in livestock forage.	Up to 55 percent reduction in reliable livestock forage/Class I allotments. Mulch levels for the given year would determine the actual allocation.	Up to 80 percent reduction in reliable livestock forage/Class I allotments. Mulch levels for the given year would determine the actual allocation.	Up to 65 percent reduction in reliable livestock forage/Class I allotments. Mulch levels for the given year would determine the actual allocation.	Approximately one-half of the livestock operators would be substantially affected.
- Recreation	Some decrease in quality of hunting and fishing experiences. Minor impact on whitewater rafting, swimming, picnicking and hiking experiences.	Some decrease in quality of hunting and fishing experiences. Moderate impact on all water related recreation. Moderate to high impact to trail experiences and conditions along the Pacific Crest Trail.	Hunting and fishing experiences would remain at present levels. Minor impact on whitewater rafting, swimming, picnicking and hiking experiences.	Hunting experiences would decrease on Class I allotments, and remain at present levels on Class M & C allotments. Some fishing experiences would decrease. Minor impact on whitewater rafting, swimming, picnicking and hiking experiences.	Hunting and fishing experiences would improve. Impacts to whitewater rafting swimming and picnicking experiences would be eliminated. Hiking experiences along the Pacific Crest Trail would improve. Maintenance costs on the Pacific Crest Trail would be reduced.

Table 1 (Cont.)

Impacted Resources	Proposed Action	Livestock Maximization	Resource Protection	Balanced Resource Use	No Grazing
- Vegetation	5610 acres altered by vegetation manipulation, leading to an increase in forage production. Some over obligation of competitive species.	9410 acres altered by vegetation manipulation, leading to an increase in forage production. Over obligation of competitive species.	3140 acres altered by vegetation manipulation, leading to a slight increase in forage production.	6560 acres altered by vegetation manipulation, leading to an increase in forage production.	Large mulch build-up causing a serious fire hazard.
- R T & E Plants	Potential deterioration of sensitive species habitat.	Potential deterioration of sensitive species habitat.	Does not eliminate all potential impacts, therefore there may be continued habitat deterioration for some sensitive species.	Same as Alternative 3, Resource Protection	Sensitive species habitat would generally improve in many areas, if currently impacted by livestock, with an expected increase in populations.
- Cultural Resources	2 recorded cultural resource sites may be impacted. An unknown number of unrecorded sites may be impacted.	19 recorded cultural resources sites may be impacted. An unknown number of unrecorded sites may be impacted.	3 recorded cultural resources sites may be impacted. An unknown number of unrecorded sites may be impacted.	17 recorded cultural resource sites may be impacted. An unknown number of unrecorded sites may be impacted.	An unknown number of cultural resources sites may be impacted. Generally, the condition of presently impacted sites would improve.
- Wilderness	0.5 miles of fence. 5 spring developments. No vegetative manipulation. No change in Active Preference AUM's.	3 miles of fence. 7 spring developments. 2,800 acres of vegetative manipulation. A 133 AUM increase in Active Preference.	0.5 miles of fence. No spring developments. 700 acres of vegetative manipulation. No change in Active Preference AUM's.	3 miles of fence. 5 spring developments. 2,000 acres of vegetative manipulation. A 70 AUM increase in Active Preference.	90+ miles of fence. No spring developments. No vegetative manipulation.

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Consultation and Coordination

The public was informed of the preparation of this Draft Environmental Impact Statement (DEIS) by a media release/response letter mailed on August 23, 1982. Federal Register Notice was given on the same day.

Public input from preplanning and planning, from various interest groups that did not necessarily pertain to planning, and personal contacts were used in the finalization of issues and alternatives for the DEIS.

The California State Clearinghouse and State Historic Preservation Officer were notified before the development of the DEIS. Much information was obtained through consultation at a working level from other federal, state, and local agencies.

The DEIS was filed with the Environmental Protection Agency on April 26, 1983. A Federal Register Notice was published and copies of the DEIS were distributed to the public. A 45 day period ending June 13, 1983, was alloted for public comment and review.

Ten comment letters were received. Major concerns expressed by several respondents include comments about environmental impacts resulting from range improvement projects such as water developments, prescribed burning, fencing, etc. Emphasis was also placed on project impacts on the watershed. It must be stressed that each project will undergo an environmental analysis (EA) subsequent to this document. This EA will identify on and off-site impacts and reference approved land use plans which consider all resources managed by the BLM. Additionally, allotment management plans (AMPs) will be developed for Class I allotments. These AMPs are cooperatively developed with the operators and portray management prescriptions which include economic analyses of range projects and consider resources other than range.

The letters are reproduced in this Final EIS (FEIS) with each broken down to specific comments about the analysis in the DEIS. BLM responses immediately follow each of the letters with a corresponding letter number and comment number. For example, 1-1 represents letter number 1, comment number 1.

We are grateful to those who took the time to comment.

Comment Letter 1

Kern Audubon Society

P.O. Box 3581 ☐ Bakersfield, CA 93385-3581

May 30, 1983

Glenn Carpenter
Caliente Resource Area Manager
Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

RE: South Sierra Foothills Grazing Environmental Impact Statement

Dear Mr. Carpenter:

I found this D.E.I.S. to be very informative and, in the main, easy to understand. It was hard sometimes though to keep track of which alternative was being discussed

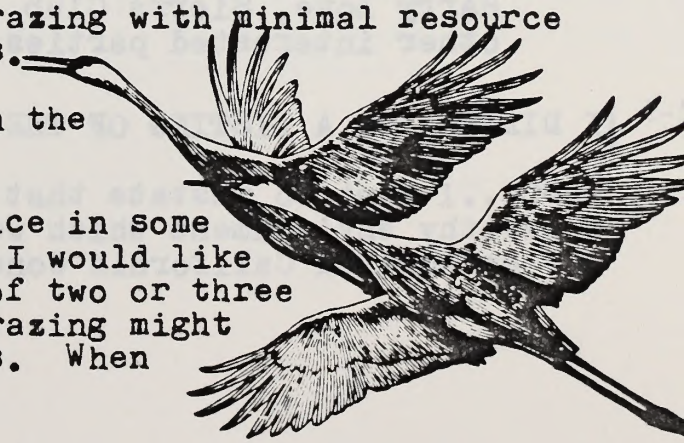
I was impressed with the number of people who helped to compile the information, thirteen of them. That's pretty good. The amassed information really made B.L.M.'s approach sound scientific. The "management for mulch" sounds very good.

Members of our Board and Conservation Committee would support Alternative 4, the Balanced Resource Use, over Alternative 1, the Proposed Alternative and present management.

We definitely oppose Alternative 5, No Grazing, since it is unfair to ranchers and since the California Condor relies heavily on the carcasses of deal range animals.

Livestock Maximization, Alternative 2, would be too damaging to the environment and Alternative 3, Resource Protection, would be unacceptable to ranchers although it would really be the best overall for wildlife.

Overgrazing seems to have been the trend on many lands operated by B.L.M. in the past, and I understand that the Natural Resources Defense Council is so concerned about this that they have brought suit against B.L.M. for overgrazing practices. It seems likely, too, that the general philosophy of the Reagan administration and James Watt in particular leans toward heavy grazing with minimal resource protection or monitoring of public lands. The newspapers and magazines have been carrying a lot of articles about this in the past two years.



Since overgrazing may be the practice in some of the South Sierra Foothills area too, I would like to ask whether a rest-rotation routine of two or three years grazing and one or two years no grazing might be better in the long-term for our lands. When

1-1

grazing animals have constant access to sensitive areas, they eat up the grasses and also chew up aspiring new shrubs so that the lands
1-1 they graze on tend to be more grassy than may be normal and far less devoted to shrubs. Wildlife needs shrubs and trees more than they need the grasses...or at least as much. A rest-rotation routine might allow more shrubs to grow back, thereby giving wildlife more of a chance to thrive

I would like to know who would measure the mulch each year or however often it would be done. How many samples of mulch would be
1-2 taken to give an accurate measurement? Does the funding now exist to monitor the mulch adequately?

On controlled burns, I would suggest that land not be burned until the shrubs are really too thick for wildlife. The decision to burn or
1-3 not to burn should be at the disgression of B.L.M. and not of the ranchers. This is public land and public servants should make these kinds of decisions. They are also the ones who should conduct any burns.

The suggested mitigation measures were excellent. (2-24 and
1-4 2-25) Is funding available? Who would carry out these measures and when?

Even if full compliance with these suggestions couldn't be carried out in the immediate future, they may be more feasible with a new administration and a healthier economy.

Thank you for the opportunity to comment.

Very truly yours,

Irene Heath

Irene Heath
Conservation Chair

copies to:

National Audubon Society
Harry Love, Sierra Club
other interested parties

1-5 I DIDN'T SEE A LISTING OF THE PARTIES WHO RECEIVED COPIES OF THIS DEIS.

ALSO...I want to restate that our chapter's main concern right now is a healthy environment which would maximize the survival potential of the endangered California Condor.

Response to Letter 1

1-1 It is very possible that rest rotation grazing systems or deferred rotation systems may be implemented when an AMP is developed. The EIS process is too early to discuss grazing systems, however. It is an analysis document. The decision as to which alternative is chosen comes after the EIS is completed. At that time allotment management plans (AMPs) are written which spell out what grazing system(s) will be utilized to accomplish the planning objectives.

1-2 Mulch would be measured each year. A series of photographs, showing various mulch levels on the important annual vegetation types would be compiled. The BLM Range Conservationist would use these photos as a guide to determine when to start taking mulch samples. The number of samples taken may vary for each allotment. The sampling would be done by the BLM Range Conservationist, but the grazing operator and the interested public will be encouraged to participate. The BLM has adequate funding for mulch sampling at the present time.

1-3 The standard operating procedures will be changed to state that chaparral must be too decadent to provide significant forage for wildlife and livestock before it would be burned unless other resource concerns such as fire hazard reduction warrant prescribed burning. Other areas, such as the Pinyon Pine Forest never actually get too thick for wildlife, but they do get so thick that they crowd out all forage plants for both wildlife and livestock. All prescribed burns, whether rancher or BLM initiated, must have a site specific environmental assessment before burning. The BLM must also approve the burn plan. The Authorized BLM Officer always has the final authority to permit or reject a proposed burn on public land.

1-4 It is BLM's responsibility to insure that identified mitigation is accomplished when projects are conducted. Projects will be assigned priorities and funded accordingly as funds become available through the Bureau's financial management system.

1-5 There is a list of all Agencies, Organizations and Individuals to whom copies of the DEIS were initially sent on page 5-1. It is also in several county libraries. In addition, copies of the DEIS have been provided to the public during the comment period by the Caliente Resource Area and Bakersfield District Offices.

Comment Letter 2

Resources Building
1416 Ninth Street
95814

(916) 445-5656

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

JUN 1983
U.S. DEPT. INTERIOR
BUREAU LAND MGMNT.
BAKERSFIELD, CALIF.
CALIENTE
AREA

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Conservation Corps
Colorado River Board
Energy Resources Conservation and Development Commission
Regional Water Quality Control Boards
San Francisco Bay Conservation and Development Commission
Solid Waste Management Board
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control Board

JUN 1983
RECEIVED
U. S. DEPT. INTERIOR
BUREAU LAND MGMNT.
BAKERSFIELD, CALIF.

Mr. Robert D. Rheiner, Jr.
Bureau of Land Management
800 Truxtun Avenue, Room 302
Bakersfield, CA 93301

June 9, 1983

Dear Mr. Rheiner:

The State has reviewed the draft EIS, South Sierra Foothills Grazing Management, submitted through the Office of Planning and Research in accord with the National Environmental Policy Act of 1969. This review was coordinated with the Air Resources and Water Resources Control Boards and the Departments of Conservation, Fish and Game, Parks and Recreation, Forestry, Water Resources, Food and Agriculture, and Transportation.

In its letter of May 31, 1983, the Central Valley Regional Water Quality Control Board informed BLM's Glenn Carpenter of its concerns. The Board recommended that BLM review all activities in light of mitigation measures 4 - 7 in Table 25 of the report.

The Department of Fish and Game (DFG) has submitted the attached memorandum of May 27, 1983, as its comments on this project: DFG is concerned that BLM has not, in the Department's view, given aquatic and wildlife resources equal consideration with other resources. DFG recommends a more precise discussion of project impacts because all of the proposed alternatives (except "No Grazing") would result in a significant reduction in aquatic and wildlife resources. The Department has also provided a copy (attached) of its July 1, 1982 letter to BLM; the concerns expressed in that letter have not been adequately addressed, DFG states.

Questions regarding DFG's comments should be directed to George Nokes, Regional Manager, 1234 East Shaw Avenue, Fresno 93710 or (209) 222-3761.

Sincerely,

for GORDON F. SNOW, Ph.D
Assistant Secretary for Resources

Attachments (2)

cc: Office of Planning and Research
(SCH 82052003)

Comment Letter 2

State of California — The Resources Agen

Memorandum

To : Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Attention: Projects Coordinator

Date : May 27, 1983

From : Department of Fish and Game

Subject: DEIR for South Sierra Foothills Grazing Management, SCH #82052003

The Department of Fish and Game has reviewed subject DEIR regarding the BLM's proposed grazing program for the South Sierra Foothills Planning Area of Tulare and Kern Counties.

Our review of this document leaves us disappointed and seriously concerned about BLM's future actions under their proposed preferred alternative. The proposed action will lead to continuation of grazing above the surveyed forage ratings on some allotments, additional streambank and riparian vegetation deterioration, reductions in wildlife and fisheries habitat values, and potential impacts to rare and/or endangered plants and animals. Our specific comments on the DEIS are as follows:

Wildlife Resources

2-1	Page 1-4	The "Mineral King" and "Walker Pass" deer herds should be referred to as the Kaweah and Monache herds, respectively.
2-2	Page 1-7	It is the Piute deer herd that inhabits the Scodie Mountains and not the Monache herd.
2-3	Page 1-15	The retention of a selected residual mulch level may be largely ineffective as a resource protection measure due to the difficulty in adequately monitoring mulch levels and the reluctance among ranchers to remove all livestock on short notice. Does the last sentence on page 1-15 actually mean that livestock grazing can begin before any new growth occu providing that full utilization was not made during the previous grazing season? If so, early grazing could be highly detrimenta many wildlife species because of the cow's natural preference for acorns over dry residuals from the previous season.
2-4	Page 1-16	Proper utilization may never be exceeded on annuals by using the mulch management method, but grazing that occurs before green-up will not satisfy wildlife objectives.

2-5	Page 1-18	There is no assurance that the browse component will be adequately protected in the Class M and C categories since no monitoring is scheduled. The maintenance and protection of this key wildlife habitat component must be planned for and monitored.
2-6	Page 2-2	The Proposed Action Alternative provides for rangeland improvements "as proposed by the livestock operator" but fails to emphasize the potential for wildlife improvement on the public's land through water and range development. Improvements on public land should coordinate the needs of wildlife with those of livestock.
2-7	Page 2-3	If Alternative 3 is to achieve optimum wildlife production, why would there need to be fewer rangeland improvements implemented than in Alternatives 1 and 2? The water developments and range improvements identified could be made for wildlife.
2-8	Page 2-17	(Table 8). When managing for optimum wildlife production under Alternative 3, why identify only areas suitable for livestock grazing as vegetation treatment areas (as stated in footnote 2)? The selection of projects should also consider wildlife needs.
2-9	Page 2-24	Project design guideline #9 is a good standard from a wildlife perspective given that livestock numbers are not increased to a point where benefits are negated.
2-10	Page 2-25	Project design guideline #10 is also a good standard, but seems somewhat inconsistent with the statement on page 4-33, under the Proposed Action Alternative 1, that one unavoidable adverse impact will be the "continued deterioration of certain sensitive species habitat".
2-11	Page 3-2	The Kaweah deer herd occupies much more public land than indicated. It may be more accurate to say that private lands comprise about 17 percent of the range.
2-12	Page 4-3	It is not necessarily true that overgrazing by deer would be a problem impact if Alternative 5 (No Grazing) was adopted. Build-ups in the herd population could be controlled through special hunts.
2-13	Page 4-12	An additional impact not identified under "Non-Issue Related Impacts" is that development of additional water in heretofore ungrazed areas will undoubtedly be detrimental to deer and other wildlife species.

2-14 Pages 4-30, 4-31 — The listing of protective measures that "may not be selected" is confusing and misleading. Decisions on required measures should have been made prior to issuance of the DEIS.

2-15 Page 4-33 — An unavoidable adverse impact that should have been listed under the Proposed Action Alternative is the continued reduction in deer populations on public land.

2-16 Page 4-34 — It should be recognized that long-term improvements in wildlife production will not be possible if livestock allocations are increased to make use of range improvements.

2-17 Page A-1 — The statement in paragraph 2 that overgrazing will not be permitted at any time on public land is not consistent with data provided in Tables 22 and 23. Under the Proposed Action Alternative, grazing in excess of the surveyed forage rating will be allowed on allotments 0074, 0078, 0086, 0103, 0075, 0076, 0120, 0087, 0084, 0111, 0023, 0059, 0081 and 0119.

Aquatic Resources

2-18 The DEIS is inadequate in its discussion of impacts of grazing upon aquatic resources of the South Sierra Foothill area. During the agency review of the Pre-Planning Analysis, our Department provided written comments, dated July 1, 1982 (copy attached), which outlined specific aquatic resource issues which would need to be considered. The DEIS, on page 1-4, does not include any of our concerns among the major issues to be addressed; nor are these concerns addressed in either general or specific terms, anywhere within the text of subject document.

The maps in Chapter 2 of the DEIS indicate that BLM grazing allotments exist upon the lands immediately adjacent to or within the watersheds of several waters which support significant migratory and resident sportfishery resources. These include, but are not limited to, the Kern River, Isabella Lake and the East Fork Kaweah River. The significance of these fisheries has been well documented in many prior environmental documents pertaining to hydroelectric proposals and projects on these waters. There is no question that they constitute significant resources, or (based upon abundant literature sources and our past experience) that they could be adversely affected by livestock grazing.

The above omissions in the DEIS are significant ones which will need to be corrected in the FEIS when issued.

In summary, we believe that aquatic and wildlife resources have failed to receive equal consideration with other resources in the Bureau's land management planning process. If direct and cumulative impacts upon these resources are allowed to accrue, an adequate public disclosure is needed, pursuant to the National Environmental Policy Act. Because all of the proposed alternatives except the "No Grazing"

alternative would result in significant reductions in these resources, we believe the impacts must be more precisely addressed in subject EIS.

If you have any questions regarding the above comments, please address them to George Nokes, Regional Manager, at 1234 East Shaw Avenue, Fresno, CA 93710, phone (209) 222-3761.

for Director

Attachment

Comment Letter 2

STATE OF CALIFORNIA—RESOURCES AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF FISH AND GAME
REGION 4
1234 E. Shaw Avenue
Fresno, CA 93710
(209) 222-3761

July 1, 1982

Glen Carpenter
Bureau of Land Management
800 Truxtun Avenue, Room 302
Bakersfield, CA 93301

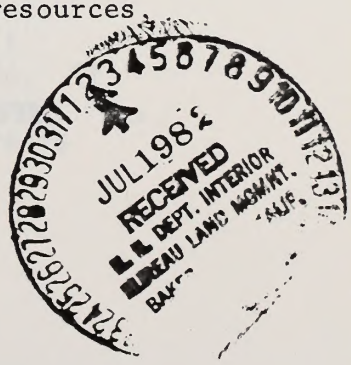
Dear Mr. Carpenter:

Subject: SCH #82052003 - South Sierra Foothills Pre-Planning Analysis

The Department of Fish and Game has reviewed subject document regarding inventory and planning for grazing use in the South Sierra Foothills Planning Area of Tulare and Kern Counties.

In general, we believe the document adequately recognizes the major issues of concern to us relating to wildlife needs. However, the analysis has failed to identify some of the impacts and issues of livestock grazing on the fisheries and aquatic resources of the planning area. Therefore, we would like to see the following comments considered for incorporation in your planning process. They are referenced to the appropriate page numbers of your document.

Page 2, A	The discussion of the issue of livestock grazing should recognize the need to address grazing impacts on the fishery resource.
Page 2, C	We believe that there is a need to better identify areas open to the public and the available access routes.
Page 2, D	The DEIS should discuss the impacts that development demands will have on groundwater supply within the study area and the consequences of lowered water tables on available stream habitat and aquatic biota.
Page 3, F	It should be noted that recreational utilization is also causing conflicts with the fisheries resource.
Page 5, #1	This planning objective should also include the minimization of grazing impacts on aquatic resources, especially the fisheries aspect.



Page 5, #2a	Resource utilization activities should be managed to levels approaching public demands only where water quality and watershed protection can be maintained or improved. Critical watershed areas should also be avoided to minimize impacts to aquatic resources.
Page 8 Alternatives #1, 2 & 3	Where "wildlife habitat" is mentioned within the formulation criteria of each alternative, it should be changed to read "wildlife and aquatic habitat".
Page 9 Alternative II	The last sentence should be changed to read "Support existing populations of wildlife and aquatic species."
Page 9 Alternative III	The last sentence should be changed to read "Only insure continued existence of wildlife and aquatic resources."
Page 17, A	An additional type of decision to be made would be to "determine grazing impacts on aquatic resources, especially the fisheries resource".
Page 17, B	An additional type of decision to be made would be to "determine water quality levels necessary to support existing aquatic life".
Page 18, B, 1	An additional specific information need would be the "impacts on aquatic resources, especially fish stocks".
Page 19, B, 2	An additional specific information need would be to "identify existing or potential water quality threats to aquatic resources".
Page 27, A	Your SSF Work Plan should require an inventory of streams, lakes and associated aquatic resources in the planning area.

We hope the above comments will be helpful to you in your preparation of a comprehensive plan for livestock grazing use in the South Sierra Foothills Unit. If you have any questions or concerns regarding these comments, please contact Rod Goss at 1234 E. Shaw Avenue, Fresno 93710, phone (209) 222-3761.

Sincerely,

Robert E. Eckles

for George D. Nokes
Regional Manager

cc: Office of Planning & Research

Response to Letter 2

2-1 The proper names of the deer herds were given on page 3-2 of the DEIS. They will be moved to p. 1-4.

2-2 The Scodie Allotment (0118) has been misspelled. It should read Scobie Allotment. It is located north of Chimney Peak, within the range of the Monache Herd. This correction has been made in the Revisions and Errata Section.

2-3 Please refer to page 1-15, paragraph 6. It states "not all allotments in the study area can be managed for mulch." Page 1-15 goes on to say that only I Category allotments in the annual areas will be managed for mulch. This amounts to six allotments that are completely on the annual range and two that are partially on the annual range. All will be placed under Allotment Management Plan (AMP) before institution of mulch management. An AMP is, by design, a cooperative agreement which requires close coordination between the operator and BLM. This fact will eliminate changes in operation or short notice.

The Caliente Resource Area has adequate personnel for monitoring these areas. The livestock operators involved, other agencies, and the interested public will be encouraged to participate in the mulch measurement from the outset of the grazing season. Several parties have expressed interest in participation. With rancher participation, there will be no rude surprises to the ranchers when they are directed to remove their livestock. The ranchers will have had ample time to make other arrangements for their cattle. It should be noted that we have had very little reluctance from ranchers to remove their stock in the past.

2-4 The concept of carryover presented on page 1-15 is further explained on A-4 and in the Revisions and Errata. Only two I Category allotments, North Fork River (0017) and Wagy Flat (0090) have a sufficient number of oak trees to produce an acorn crop of any size. Wagy Flat's season of use protects the acorn crop there and the North Fork River is not currently being used to the extent its acorn crop is being damaged. Future AMP development will address this issue. Should livestock use the "carryover", protein supplements may be used to take pressure off browse species, and satisfy wildlife objectives.

2-5 There will be limited monitoring of livestock usage on M and C allotments. This does not, however, preclude intensive monitoring for wildlife forage, nor does it preclude intense monitoring of livestock use should problems for wildlife arise. If this occurs, the allotment would be moved to the I Category.

2-6 The proposed action is the Existing Situation Alternative. It encompasses only what the ranchers are doing or may plan to do. If this alternative were selected, wildlife would receive the same consideration that they presently do. It is agreed that there is considerable potential for wildlife improvements.

2-7 The rangeland improvements spoken of are better termed "livestock related developments" (please see the definition of rangeland improvements in the glossary, page G-3). Livestock waters, of course, will be adapted to serve wildlife as well as livestock. (Please see page 2-24, guideline 6.) Small water developments to increase the number and range of various wildlife species may be constructed under this alternative but do not fit the definition given for rangeland improvements.

2-8 The EIS analyzes grazing impacts and the impacts of rangeland improvements (livestock related developments). Therefore, analyzing the impacts of prescribed burning areas unsuitable for grazing is not within the scope of this EIS. Prescribed burning specifically for wildlife is an activity that may occur but the decision relating to that would be generated through BLM's land use planning system rather than through the grazing EIS.

2-9 Comment noted. If numbers of livestock were increased, there would still be at least a proportionate share of increased forage allocated for wildlife under each alternative except for livestock maximization.

2-10 Project guideline 10 refers to new projects only. The statement on page 4-33 refers to the entire area covered by the EIS.

2-11 The term "public land", as defined in the glossary on page G-3, refers to land administered by the BLM. It does not include land administered by the National Park Service, United States Forest Service, or any other public agency beside the BLM. Since there is relatively little BLM land in the range of the Kaweah Deer Herd, "about 17%" is a good estimate of the public land occupied by the herd.

2-12 The Department of Fish and Game could hold special hunts if deer overpopulation occurred. Therefore, the statement on page 4-3 under Alt. 5 will be modified to this effect. Please see Revisions and Errata.

2-13 The impact of livestock water developments on wildlife was not addressed under non-issues because, as stated on page 1-4, the impact of grazing on wildlife (including water sources) is an issue, not a non-issue. More water sources, with proper livestock numbers and seasons of use, may actually benefit wildlife by creating better livestock distribution and providing additional water for wildlife. These benefits, however, may be cancelled by the opening up of new areas to livestock. Thus, the net effect of new livestock waters may be nil in many cases.

2-14 The DEIS was not an attempt to make a decision but to identify an array of options for analysis and management consideration. Additionally, the Standard Operating Procedures and Project Design Guidelines identified actions which will take place when projects are developed. Also, after the analysis of potential impacts, and identified procedures for mitigation, the recommended mitigating measures were developed. While it is possible that many of those measures may be adopted, it is also possible that some will not.

2-15 The fact that the proposed action will cause continued decline of deer populations on public land is hereby added to the Unavoidable Adverse Impacts. Please see Revisions and Errata.

2-16 It is not assumed in this section that only livestock would be allocated additional forage. Wildlife would also receive additional forage.

2-17 It is against BLM policy to allow overgrazing to occur on public land, however, it is also necessary to monitor allotments for several years before adjustments in livestock preference can be made unilaterally. Such adjustments can not be made on the basis of a one time inventory. However, some operators have expressed an interest in reducing their preference voluntarily. It should also be noted that some operators who may have a high level of preference over surveyed AUM's may not be stocking that heavily.

2-18 Your comments relating to concern for the fisheries and aquatic resources have been considered. As you suggested, an inventory of streams and springs was conducted. Data were obtained on stream and spring discharges, water quality, channel stability, surface erosion and watershed conditions. Unfortunately, funding for the inventory was insufficient to do the work necessary to determine water quality levels necessary to support existing aquatic life.

The water quality and erosion problems identified in the DEIS do constitute a threat to aquatic habitat and fisheries. Water quality and erosion problems on some perennial streams in the central part of the study area appear to be caused by livestock grazing. Generally, the areas adjacent to perennial streams in the northern part of the study area are too ragged to be accessible to cattle.

Water quality will be monitored (p. 2-27) to determine the continuing effects of grazing management. The application of protective measures such as Standard Operating Procedures number 6 (p. 2-23), Project Design Guidelines 1 and 8 (p. 2-24) and Recommended Mitigation Measures (p. 4-30 & 31) should help protect and improve aquatic habitat. In addition, Best Management Practices will be developed to correct specific water quality and erosion problems. Your concerns regarding the effects of other land uses have also been considered in the overall land use plan for the South Sierra Foothills.

Comment Letter 3

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, *Governor*

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
CENTRAL VALLEY REGION**

SAN JOAQUIN WATERSHED BRANCH OFFICE:
3374 EAST SHIELDS AVENUE, ROOM 18
FRESNO, CALIFORNIA 93726
PHONE: (209) 445-5116

31 May 1983

Mr. Glenn Carpenter
Caliente Resource Area Manager
Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

DEIS FOR SOUTH SIERRA FOOTHILLS GRAZING MANAGEMENT, SCH NO. 82052003

I have reviewed the Draft Environmental Impact Statement for the subject proposal in view of water quality impacts and prepared the following comments.

3-1 We are concerned about the degradation of water quality and stream stability in certain areas due to the impacts of the proposed actions for grazing management. Before we can concur with the plan as proposed, we recommend that all activities be reviewed in light of the mitigation measures No. 4, 5, 6, and 7 in Table 25.

If you have any questions, please call.

Karen E. McNeill

KAREN E. McNEILL
Land and Water Use Analyst

KEM:hmm

cc: Office of Planning and Research

Response to Letter 3

3-1 The BLM is developing a Land Use Plan for the South Sierra Foothills area. This EIS is part of that plan (please see page 1-19, Planning and Environmental Analysis Process, Land Use Planning). The Land Use Plan specifically addresses water quality, pursuant to BLM's 208 Water Quality Management Report.

In addition, please note page 2-23, Standard Operating Procedure number 6. It states: "Grazing management activity will comply with the Federal Water Pollution Control Act of 1972, as amended by the Clean Air Act of 1977. Therefore, it is mandatory that the BLM give diligent consideration to mitigation measures numbers 4,5,6 and 7 in Table 25. The Water Quality Control Board's concern will also be considered when final land use planning decisions are made.

Comment Letter 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

JUN 13 1983

Glenn A. Carpenter
Caliente Resource Area Manager
Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

Dear Mr. Carpenter:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled South Sierra Foothills Grazing Management. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send two copies of the Final EIS (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical, and
Resources Management

Enclosures (2)

Water Quality Comments

4-1 1. The discussion of water quality monitoring on page 2-27 of the DEIS should be expanded in the FEIS to include the methods, parameters and frequency of monitoring.

4-2 2. While sediment is discussed as a common stream problem on page 3-5 of the DEIS, the mitigation measures for water quality do not address the improperly located and designed diversions or poor road construction and maintenance problems referenced in this discussion. Such mitigation measures should be included and committed to in the FEIS.

EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Response to Letter 4

4-1 Specific monitoring plans cannot be identified in the DEIS since they will be developed and implemented as projects are planned and completed.

4-2 See comment 3-1. The diversion, road construction and maintenance problems referenced on page 3-5 are not totally grazing related but include other resources as well. These concerns are addressed in the overall land use plan and mitigating measures are being developed accordingly.

Comment Letter 5

COOPERATIVE EXTENSION
UNIVERSITY OF CALIFORNIA

COUNTY OF TULARE
FARM AND HOME ADVISORS OFFICE
AGRICULTURAL BUILDING
WOODLAND AND W MAIN STREETS

MAILING ADDRESS
AGRICULTURAL BUILDING
COUNTY CIVIC CENTER
VISALIA, CALIFORNIA 93291
PHONE (209) 733-6363

June 8, 1983

Glenn Carpenter
Caliente Resource Area Manager
Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

Dear Glenn:

Thank you for inviting my comments on the "South Sierra Foothills Grazing Environmental Impact Statement." I would compliment you and your staff on preparing a complete document. Complete as it may be it does contain some inaccuracies and deficiencies.

5-1 Since the impact of grazing by livestock is critically examined, it seems that it would be appropriate to have a person trained in animal husbandry on your staff. Also, the principal theme throughout is that use by livestock has the greatest effect on vegetation, wildlife, etc. The fact is that natural occurances, which would include weather and fire, have much

5-2 greater impacts on all aspects examined in your statement. I would also like to see a cost-benefit ratio developed in your economic analysis.

While there are a number of items in your statement I would differ with, it would serve no purpose to define them. I would hope that at some point in time the impact of livestock on range land would receive a more balanced evaluation.

I am sorry that you and your staff could not find time to attend our range science short course. Those that attended were quite complimentary on the training they received.

Again, thank you for receiving my comments.

Sincerely,

Bob Miller

Robert F. Miller
Farm Advisor

ms
cc: Jim Clawson
Gordon Heebner

The University of California's Cooperative Extension Programs are available to all, without regard to race, color, or national origin.

Cooperative Extension Work in Agriculture and Home Economics, U. S. Department of Agriculture, University of California, Tulare County Cooperating.

Response to Letter 5

5-1 While it is agreed that natural occurrences may have great impacts on the study area, the DEIS was written to analyze the impact of a range of potential grazing practices on the study area. The concept of mulch management was included to consider some of the relationships between climate, its effect on vegetation, and livestock use. It was not intended to portray livestock as having the greatest effect on vegetation, wildlife, etc., but recognizes that there may be ranges of impacts as different practices are followed, expecially as related to perennial vegetation.

5-2 Benefit/cost ratios will be developed on all range improvements and AMPs before they are implemented. Improvements and AMPs come after the EIS is completed. Thus benefit/cost ratios were not part of this EIS. Please see item number 2 in Revision and Errata.

Comment Letter 6

KERN COUNTY PLANNING DEPARTMENT

RANDALL L. ABBOTT
PLANNING DIRECTOR

1103 GOLDEN STATE AVENUE
BAKERSFIELD, CALIFORNIA 93301-2499
TELEPHONE (805) 861-2615

June 14, 1983

File: Gen Corres

Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

Attention Glen A. Carpenter

Re: South Sierra Foothills Grazing Management
Draft Environmental Impact Statement (EIS)

Gentlemen:

The Environmental Division of the Kern County Planning Department has reviewed the above-noted document and conferred with key Bureau personell in your Caliente Resource Area office. We feel the document was well prepared and backed by extensive field observation.

An an informational, or "disclosural" document, the EIS presents an intelligible picture of grazing concerns. Certain elements appear to require additional clarification. These generally fall into two categories: (1) sphere of influence and (2) monitoring and consultation.

6-1 1. **Sphere of Influence.** Significant cumulative and/or secondary effects of management actions upon surrounding lands outside the Bureau jurisdiction require consideration in the EIS. All four issues (wildlife, water quality, economic, and recreational impacts), identified as significant effects upon Bureau of Land Management lands, should be discussed in terms of the influence of these effects upon adjacent properties, particularly where ongoing projects beyond the scope of the current management may conflict with, or increase, the hazards of such grazing management.

Specific examples can indicate the importance of extending the impact assessment to include this sphere of influence. The grazing allotments #0089 (Havilah Common (Note: this should be shown as an "I" category allotment whereever shown)), #0117 (Red Mountain), and #0119 (Bald Eagle Peak) occur on relatively steep slopes (30 percent to 60 percent) on soils noted as having high erosional potential when denuded of vegetation. Up to 2,300 acres of shrub cover are proposed for vegetative manipulation consisting of prescription-burn conversion to grassland. Members of the BLM staff have indicated that, prior to any burn, an Environmental Assessment (EA) will be conducted addressing the specific action. The need for an EA is not mentioned in the DEIS.

The Final EIS should: (a) document probable impacts of proposed and alternative manipulations upon the erosional patterns and water quality of the subtending watershed, particularly with regard to the towns of Havilah and Pines of Havilah, (b) clarify that "prescription burning" (and all manipulative actions) require site-specific environmental assessment and separate documentation prior to being implemented, and (c) note and make available the EA process to local agencies and interested public.

A second example includes portions of twelve allotments that occur on, or adjacent to, lands recognized by the County as environmentally unique and sensitive to disturbance. Most include populations of rare and/or endangered plants; others are key wildlife habitat. In each case, management of the portions of habitats upon Bureau lands could significantly alter population structure and stability of surrounding natural areas. It is felt that the considerable data contributing to the present document includes far reaching effects (particularly concerning deer populations), and that such data need not be a part of the text. The availability and location of such data should be included, however, so that concerned parties may refer to specific studies. Again, the necessity of the EA becomes apparent, particularly where protection of rare and endangered plants and animals may conflict with grazing. The need for this EA process should be clearly indicated within the Final EIS.

6-2

2. **Monitoring.** It is the nature of the proposed management that each action will produce long-term, rather unpredictable, change. Proper management of such a dynamic system requires controlled monitoring and continual program modification. Personal communication with the project staff indicates this to be understood. The FEIS should clearly note where such monitoring programs will occur. Particular emphasis is urged by the County where watershed and wildlife changes are expected that will extend beyond Bureau jurisdiction. Ongoing study results, including those of the EA process, should be open to objective review at State and local levels.

6-3

The Kern County Planning Department feels that cooperation between agencies is essential to proper land management and appreciates the opportunity to comment on this project. We would appreciate being included in the consultation process during the forthcoming Environmental Assessment programs, particularly when the actions under study affect subtending watershed quality and surrounding plant and animal populations on County-administered lands. Please feel free to call our office at (805) 861-2387 should you have questions.

Very truly yours,

RANDALL L. ABBOTT
Planning Director

By Michael Theroux
Junior Planner

slb

Response to Letter 6

6-1 Comment noted, see Revisions and Errata, Point 2 and page 8 of this document. Should prescribed burning occur on public lands, mitigation measures developed through the EA will be incorporated into the project design to minimize erosion and off site impacts.

The Havilah Common is allotment 0087 not 0089. It will remain in the M Selective Management Category at present. It is true that there is a great deal of land that could potentially be burned, but the soil is marginal. Therefore, the benefit/cost ratio of burning other areas would be more favorable. This does not preclude, however, Havilah's change to an I Category Allotment in the future.

6-2 All data used to write this EIS are available at the Bakersfield District Office or the Caliente Resource Area Office.

6-3 Overall monitoring plans will be developed as part of the Land Use Planning process. For example, specific monitoring plans will be developed as part of the activity plans for range management. Monitoring plans and studies will be coordinated with all agencies or individuals who express an interest.

Comment Letter 7

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

JUN 1983
RECEIVED
U. S. DEPT. INTERIOR
BUREAU LAND MGMNT.
BAKERSFIELD, CALIF.

June 9, 1983

BLM, Bakersfield District
Mr. Robert D. Rheiner, District Manager
800 Truxtun Avenue
Bakersfield, Ca. 93301

Dear Mr. Rheiner,

Thank you for permitting us to review the draft E.I.S. for the South Sierra foothills planning unit. We concur with the proposed "No Action" alternative with exception as noted:

7-1 | Cooperative management agreements should be utilized to encourage grazing operators to make necessary range improvements.

7-2 | Critical wildlife habitat improvements should only be accomplished as substantiated and funded by Department of Fish and Game. The Walker Pass and Mineral King deer herds deserve more attention.

The remaining issues are considered to be insignificant impacts. These are subjects that would normally be considered in the day to day management of the affected lands.

Sincerely,

Ed Dunkley,
Administrator

ED:mb

Response to Letter 7

7-1 The BLM encourages cooperative management agreements with grazing operators so they may have the opportunity to make and maintain range improvements. However this facet of the program is addressed later in the process during implementation of the Allotment Management Plan.

7-2 All improvements proposed in this EIS are primarily for livestock, but as Project Design Guideline 6, on page 2-24 states, "All existing and proposed livestock watering facilities will be designed adequately to facilitate wildlife water needs. This would seem like a logical course of action. If water is developed in a certain location, it makes sense to adapt the development for both livestock and wildlife. The California Department of Fish and Game, in conjunction with the BLM and U.S. Forest Service, is presently in the process of developing an action plan to benefit the Walker Pass and Mineral King Deer Herds. BLM is mandated to manage wildlife habitat on public lands while the state manages the wildlife; part of that mandate also includes the responsibility, where appropriate, to do more than only allow developments funded CDF&G.

Comment Letter 8

United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:
L7617 (WR-PPE)

June 7, 1983

Memorandum

To: District Manager, Bakersfield District, Bureau of Land Management

From: Acting Associate Regional Director, Resource Management and Planning

Subject: Review of Draft Environmental Statement, South Sierra Foothills Grazing Management, Kern and Tulare Counties, California (DES-83/24)

We have reviewed the subject environmental statement and have no comments to offer.

cc:
WASO (762)

JUN 1983
RECEIVED
U.S. DEPT. INTERIOR
BUREAU LAND MGMT.
BAKERSFIELD, CALIF.

Comment Letter 9

United States Department of the Interior
~~WATER AND POWER RESOURCES SERVICE~~
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY
REFER TO: MP-150

JUN 7 1983

Glenn A. Carpenter
Caliente Resource Area Manager
Bureau of Land Management
520 Butte Street
Bakersfield, CA 93305

Dear Mr. Carpenter:

We have reviewed the draft EIS for South Sierra Foothills Grazing Management and have no comments regarding this document.

Sincerely yours,

B E Mauderscheed

Acting Assistant Regional Director

Comment Letter 10

Office Memorandum • KERN COUNTY

TO : DISTRICT MANAGER
ATTN: Robert D. Rheiner, Jr.

DATE: June 6, 1983

FROM : PUBLIC WORKS DEPARTMENT Sr for
Skip Tullock

Telephone No.

SUBJECT: South Sierra Foothills Grazing Management Draft Environmental Impact Statement

We have reviewed the subject project submitted to this office on April 25, 1983 and have no comments.

ST:jb

Response to Letters 8, 9, and 10

The respondents indicated they had no comments.

Revisions and Errata

1. The names "Mineral King" and "Walker Pass" deer herds are properly the "Kaweah" and "Monache" herds, respectively.

2. Pages 1-7, 2-6, 2-12, 2-14, 2-16, 2-18, and Map 2b. Change Scodie Allotment to Scobie Allotment.

3. Page 1-19. Add this entire Section: Site Specific Environmental Assessments and Economic Analysis. A site specific environmental assessment shall be done before any action or range improvement project is initiated. Cumulative and secondary effects will be considered.

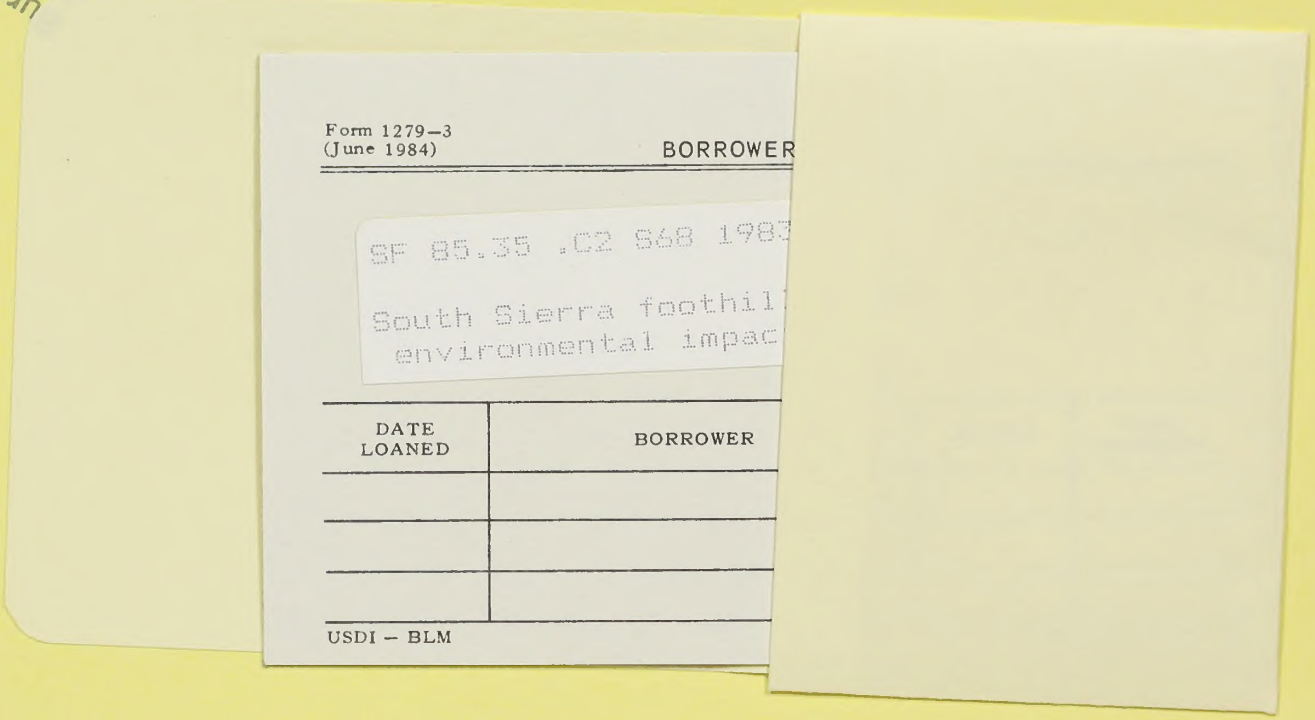
   All actions and range improvement projects will likewise have an Economic Analysis done before initiation. This would involve a benefit/cost analysis. This analysis must be favorable for the project to proceed.

4. Pages 2-21, 2-22. The most recent estimated unit cost figure for vegetation manipulation by prescribed burning is $10 per acre, not $4 per acre. Therefore-
   a. Table 10 should read: Cost for Vegetation Manipulation - 56,100; Total cost for all improvements - 286,600.
   b. Table 11 should read: Cost for Vegetation Manipulation - 94,100; total cost for all improvements - 855,100.
   c. Table 12 should read: Cost for Vegetation Manipulation - 31,400; total cost for all improvements - 201,900.
   d. Table 13 should read: Cost for Vegetation Manipulation - 65,600; total cost for all improvements - 565,000.

5. Page 2-24. Project Design Guideline 9 is rewritten to read: Burning prescriptions will be written with specific goals, objectives and constraints:
   a. The watershed will not be damaged by prescribed burning.
   b. Vegetation will be treated to create a mosaic pattern which leaves ample wildlife cover.
   c. Chaparral must be too decadent to provide significant forage for wildlife and livestock before it is subjected to prescribed burning unless other resource needs warrant treatment by fire.
   d. Natural barriers or existing lines will be used as fire lines whenever possible. When this is impossible, new firebreaks may be constructed, but their width will only be the minimum width to control the fire. They will be reseeded with native or naturalized species and waterbarred to prevent erosion after the burns.
   e. Weather will be carefully monitored before and during the burns to assure adherence to the prescription.
   f. Buffer strips will be established along both sides of streams to protect riparian vegetation. Similar strips, generally a minimum of 75 feet wide, will be left around sensitive plant species (BLM manual 6740).

6. Page 4-33. In Table 22, Impacts to Wildlife - I Category Allotments, Alt. 5 No Grazing, 0077 Walker Pass Common, add "unless numbers were controlled through special hunts". Thus the paragraph would read "Food and cover for deer would increase rapidly in the short term due to lack of competition from cattle (Calif. Fish and Game). In the long term, deer populations would increase to a level where overgrazing by deer would begin to limit the health and productivity of the herd unless numbers were controlled through special hunts".

7. Page 4-33. Under Unavoidable Adverse Actions, Alternative 1 - Proposed Action, add: Continued decline of the deer population on several allotments.

8. Page A5. Add this paragraph to the end of Appendix A, Managing for Mulch: "When livestock are grazed when the herbaceous feed is dry, they should be given a protein supplement. This will tend to keep them away from browse species that are important to wildlife and supply nutrients that often are lacking in dry feed.

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225